

ku

'87 DEC -8 P 4:35

F. ROBERT REEDER  
 VAL R. ANTCZAK  
 of and for  
 PARSONS, BEHLE & LATIMER  
 Attorneys for Intervenors  
 Kennecott Corporation, Union  
 Carbide Corporation, National  
 Semiconductor Corporation,  
 Sorensen Research, Ideal Basic  
 Industries, Inc., Amoco Oil Company,  
 Westinghouse Electric, Western  
 Zirconium Division, Kimberly-Clark  
 Corporation and Chemstar, Inc.  
 185 South State Street, Suite 700  
 P.O. Box 11898  
 Salt Lake City, Utah 84147-0898  
 Telephone: (801) 532-1234

STATE OF UTAH  
PUBLIC SERVICE COMMISSION

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

\* \* \* \* \*

In the Matter of the )  
 Application of UTAH POWER )  
 & LIGHT COMPANY and PC/UP&L )  
 MERGING CORP. (to be renamed )  
 PACIFICORP) for an Order )  
 Authorizing the Merger of )  
 UTAH POWER & LIGHT COMPANY )  
 and PACIFICORP into PC/UP&L )  
 MERGING CORP. Authorizing the )  
 Issuance of Securities, Adoption )  
 of Tariffs and Transfer of )  
 Certificates of Public Conven- )  
 ience and Necessity and )  
 Authorities in Connection )  
 Therewith. )

CASE NO. 87-035-27

INTERVENORS' SECOND  
REQUEST FOR PRODUCTION  
OF DOCUMENTS

\* \* \* \* \*

Pursuant to Rules R750-1-7-2 and R750-1-7-3 of the  
 Rules of Practice and Procedure Governing Formal Hearings Before  
 the Public Service Commission of Utah, and Rule 34 of the Utah  
 Rules of Civil Procedure, Intervenors hereby request the  
 Applicants in the above-entitled matter to produce the documents

hereinafter described for inspection and copying at the law offices of Parsons, Behle & Latimer within thirty (30) days from the date of service of this Request.

#### INSTRUCTIONS

The instructions contained in Intervenors' Second Set of Interrogatories to Applicants, served simultaneously herewith, shall govern these requests, absent clear indication to the contrary.

#### REQUESTS

REQUEST NO. 1: Provide all documents identified or otherwise referred to in your answers to Intervenors' Interrogatories.

REQUEST NO. 2: Please provide detailed work papers (including all computer runs) supporting the assumptions and calculations underlying Exhibits 8.1, 8.2, 8.3, 8.4, and 8.5 to the testimony of Dennis P. Steinberg.

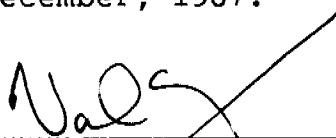
REQUEST NO. 3: With regard to Page 12, Lines 14 through 17, of the testimony of Mr. Steinberg, please provide detailed work papers supporting the calculation of savings due to operating efficiencies.

REQUEST NO. 4: Please provide all work papers supporting Exhibit 5.2 to the testimony of Dennis P. Steinberg.

REQUEST NO. 5: With regard to Mr. Steinberg's reference to "other analyses" on Page 12 of his prefiled testimony, please provide detailed work papers (including all

computer runs, inputs and outputs) supporting assumptions and calculations underlying these analyses.

DATED this 8th day of December, 1987.

  
\_\_\_\_\_  
F. ROBERT REEDER  
VAL R. ANTCZAK  
of and for  
PARSONS, BEHLE & LATIMER  
Attorneys for Intervenors  
Kennecott Corporation,  
Union Carbide Corporation,  
National Semiconductor  
Corporation, Sorensen Research,  
Ideal Basic Industries, Inc.,  
Amoco Oil Company, Westinghouse  
Electric, Western Zirconium  
Division, Kimberly-Clark  
Corporation and Chemstar, Inc.  
185 South State Street, Suite 700  
P.O. Box 11898  
Salt Lake City, UT 84147-0898  
Telephone: (801) 532-1234

CERTIFICATE OF DELIVERY

I hereby certify that I caused to be mailed, postage prepaid, true and correct copies of INTERVENORS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS to the following on this 8th day of December, 1987:

George M. Galloway  
STOEL, RIVES, BOLEY, JONES & GREY  
900 S.W. Fifth Avenue, Suite 2300  
Portland, Oregon 97204  
Attorneys for PC/UP&L Merging Corp.

Michael Ginsberg  
Assistant Attorney General  
130 State Capitol Building  
Salt Lake City, UT 84114  
Attorney for Division of Public  
Utilities

Raymond W. Gee  
KIRTON, MCCONKIE & BUSHNELL  
330 South 300 East  
Salt Lake City, UT 84111  
Attorney for Utah Farm Bureau  
Federation

Calvin L. Rampton  
Donald B. Holbrook  
Ronald J. Ockey  
L. R. Curtis, Jr.  
JONES, WALDO, HOLBROOK & MCDONOUGH  
1500 First Interstate Plaza  
Salt Lake City, UT 84101  
Attorneys for Utility Shareholder  
Assoc. of Utah

Sandy Mooy  
Assistant Attorney General  
236 State Capitol Building  
Salt Lake City, UT 84114  
Attorney for Committee of  
Consumer Services

Lynn W. Mitton  
F. Elgin Ward  
8722 South 300 West  
Sandy, UT 84070  
Deseret Generation &  
Transmission Cooperative

Robert Wall  
2470 South Redwood Road  
West Valley City, UT 84119  
Attorney for Utah Public  
Power Cooperative

Richard W. Giauque  
Gregory P. Williams  
Gary F. Bendinger  
GIAQUE, WILLIAMS, WILCOX & BENDINGER  
500 Kearns Building  
Salt Lake City, UT 84101  
Attorneys for Intervenors Coastal  
States Energy Company, Beaver Creek  
Coal Company, Cyprus Coal Company  
and Andalex Resources, Inc. (Utah  
Independent Coal Companies)

James A. Holtkamp  
VAN COTT, BAGLEY, CORNWALL & MCCARTHY  
50 South Main, Suite 1600  
P.O. Box 45340  
Salt Lake City, UT 84145  
Attorneys for Utah Associated Municipal  
Power Systems

Chris L. Engstrom  
SNOW, NUFFER, ENGSTROM & DRAKE  
90 East 200 North  
P.O. Box 400  
St. George, UT 84770  
Attorneys for Washington City

Alice Ritter Burns  
110 N. Main Street  
P.O. Box 249  
Cedar City, UT 84720  
Attorney for Cedar City Corp.

Myrna J. Walters, Secretary  
Michael S. Gilmore  
Lori Mann  
Deputy Attorneys General  
Idaho Public Utilities Commission  
Statehouse Mail  
Boise, Idaho 83720

A. Wally Sandack  
370 East Fifth South  
Salt Lake City, UT 84111  
Attorney for UMWA District 22

Paul T. Morris  
West Valley City Attorney  
I. Robert Wall  
Assistant City Attorney  
2470 South Redwood Road  
West Valley City, UT 84119  
Attorneys for West Valley City

Stephen R. Randle  
UNGRICHT, RANDLE & DEAMER  
520 Boston Building  
Salt Lake City, UT 84111  
Attorney for Salt Lake City Corp.

Roger Cutler  
Salt Lake City Attorney  
324 South State  
Salt Lake City, UT 84111  
Attorney for Salt Lake City Corp.

J. Patrick Berry  
BAKER & BOTTS  
555 West 13th Street, N.W.  
Suite 500 East  
Washington, D.C. 20004-1104

Russell Kearn, Esq.  
Callister, Duncan & Nebeker  
800 Kennecott Building  
Salt Lake City, Utah 84133

and hand-delivered a copy to:

Sidney G. Baucom  
Thomas W. Forsgren  
Edward A. Hunter, Jr.  
1407 West North Temple  
Salt Lake City, UT 84140  
Attorneys for Utah Power &  
Light Company

Robert S. Campbell, Jr.  
Gregory B. Monson  
WATKISS & CAMPBELL  
310 South Main, Suite 1200  
Salt Lake City, UT 84101  
Attorneys for PC/UP&L Merging Corp.

*Na*  
\_\_\_\_\_

281:113087B